

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SYMBOLOGY INNOVATIONS, LLC,**

**Plaintiff,**

**v.**

**AMERICAN AUTOMOBILE  
ASSOCIATION, INC.; AAA TEXAS, LLC,**

**Defendants.**

**CASE NO. 3:23-CV-02866-K**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO EXTEND STAY OF ALL PENDING DEADLINES**

Plaintiff Symbology Innovations, LLC and Defendants American Automobile Association, Inc. and AAA Texas, LLC (the “Parties”) respectfully request the Court to extend the stay of all pending motions, actions and deadlines for fourteen (14) days, up to and including June 26, 2024, to allow the Parties time to finalize the resolution of this lawsuit, including the submission of dismissal papers pursuant to the Court’s order (Dkt. No. 38). The requested extension is not for delay, but only to allow for an orderly resolution of this lawsuit.

Dated: June 12, 2024

Respectfully submitted,

/s/ Alexander H. Martin

Neil J. McNabnay

Texas Bar No. 24002583

Ricardo J. Bonilla

Texas Bar No. 24082704

Rodeen Talebi

Texas Bar No. 24103958

Sarika Patel

Texas Bar No. 24073520

Alexander H. Martin

Texas Bar No. 24091828

mcnabnay@fr.com

rbonilla@fr.com

talebi@fr.com

patel@fr.com

martin@fr.com

**FISH & RICHARDSON P.C.**

1717 Main Street, Suite 5000

Dallas, Texas 75201

(214) 747-5070 (Telephone)

(214) 747-2091 (Facsimile)

**ATTORNEYS FOR DEFENDANTS**

**AMERICAN AUTOMOBILE ASSOCIATION,  
INC. and AAA TEXAS, LLC**

Dated: June 12, 2024

Respectfully submitted,

/s/ Randall Garteiser with permission

Christopher A. Honea

Texas Bar No. 24059967

[chonea@ghiplaw.com](mailto:chonea@ghiplaw.com)

M. Scott Fuller

Texas Bar No. 24036607

[sfuller@ghiplaw.com](mailto:sfuller@ghiplaw.com)

Randall Garteiser

Texas Bar No. 24038912

[rgarteiser@ghiplaw.com](mailto:rgarteiser@ghiplaw.com)

GARTEISER HONEA, PLLC

119 W. Ferguson Street

Tyler, Texas 75702

Telephone: (903) 705-7420

Facsimile: (888) 908-4400

**ATTORNEYS FOR PLAINTIFF  
SYMBOLGY INNOVATIONS, LLC**

**CERTIFICATE OF CONFERENCE**

Pursuant to Northern District of Texas Local Rule 7.1, counsel has complied with the meet and confer requirement in Local Rule 7.1(a). Counsel for Defendants conferred with Counsel for Plaintiff on June 12, 2024, concerning the relief sought in this Motion. Counsel for Plaintiff is not opposed.

/s/ Alexander H. Martin

Alexander H. Martin

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy has been electronically filed using the CM/ECF filing system on June 12, 2024, which automatically sends email notifications to all counsel of record and which will permit viewing and downloading of same from the CM/ECF system.

/s/ Alexander H. Martin

Alexander H. Martin